

1 Josh A. Cohen (SBN 217853)
2 Gina Moon (SBN 257721)
3 CLARENCE DYER & COHEN LLP
4 899 Ellis Street
5 San Francisco, California 94109
6 Tel: (415) 749-1800
7 Fax: (415) 749-1694
8 jcohen@clarencedyer.com
9 gmoon@clarencedyer.com

10 Attorneys for Defendant JAMES ALAN ANDERSON

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 JAMES ALAN ANDERSON,
18 Defendant.

CASE NO. CR-12-0643 RS (EDL)

**STIPULATION AND ~~PROPOSED~~
ORDER MODIFYING CONDITIONS
OF RELEASE TO PERMIT TRAVEL
TO AND WITHIN THE CENTRAL
DISTRICT OF CALIFORNIA**

STIPULATION

20 Defendant James Anderson has been on pretrial release since August 31, 2012. As a
21 condition of his release, Mr. Anderson's travel has been restricted to the Northern District of
22 California, where he resides. (See Dkt. No. 9.)

23 To satisfy the employment condition of his pretrial release, Mr. Anderson has found part-
24 time employment in San Luis Obispo County (tile work for his brother). Mr. Anderson
25 accordingly wishes to expand the boundaries of his permissible travel to include the Central
26 District of California so that he may travel to San Luis Obispo County. The government does not

1 object to modifying Mr. Anderson's release conditions to permit travel to and within the Central
2 District of California.

3 The parties agree and stipulate that Mr. Anderson's conditions of release should be
4 modified to permit Mr. Anderson to travel within both the Northern District of California and the
5 Central District of California. The parties further agree and stipulate that all other conditions of
6 release should remain in effect.

7
8 IT IS SO STIPULATED.

9 DATED: October 3, 2012

/s/ Josh Cohen

10 JOSH COHEN

11 Attorney for JAMES ALAN ANDERSON

12 DATED: October 3, 2012

/s/ Susan Cushman

13 SUSAN CUSHMAN

14 Assistant United States Attorney

15 **ORDER**

16 By stipulation of the parties, and for good cause shown, it is hereby ordered that defendant
17 James Anderson's conditions of release shall be modified as follows: Mr. Anderson shall be
18 permitted to travel within both the Northern District of California and the Central District of
19 California. Mr. Anderson shall abide by all restrictions and requirements imposed by Pretrial
20 Services pertaining to the approved travel area, and shall not travel outside the Northern District of
21 California or the Central District of California without permission from this Court. All other
22 conditions of release shall remain in effect.

23
24 IT IS SO ORDERED.

25
26 DATED: Oct 5, 2012

Elizabeth D. Laporte
27 HON. ELIZABETH D. LAPORTE

28 UNITED STATES MAGISTRATE JUDGE